

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. C-24-23
	§	
JESSICA VORSTER	§	

STIPULATION OF FACT

The defendant, JESSICA VORSTER, has agreed to stipulate with the United States Attorney for the Southern District of Texas, Alamdar S. Hamdani, through the undersigned Assistant United States Attorney, Patrick Overman, to the following facts. The parties agree that these facts are sufficient to establish a factual basis for the defendant's plea to Count One (1) of the Indictment, pursuant to Fed. R. Crim. P. 11(b)(3). In addition, the defendant acknowledges that other facts outside of this stipulation exist, and those facts may be considered as relevant conduct for sentencing.

I.

For Count One (1) of the Indictment, the defendant confesses that within the Southern District of Texas between on or about March 27, 2023:

1. That the defendant and at least one other person made an agreement to use a minor child to engage in sexually explicit conduct;
2. That the sexually explicit conduct would be for the purpose of producing visual depictions of such conduct;
3. That the defendant knew such depictions would be transported and transmitted using a means and facility of interstate and foreign commerce, including by computer;
4. That the defendant knew of the unlawful purpose of the agreement;
5. That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose;

## II.

**If this case were to proceed to trial, the United States could prove each element of the offense beyond a reasonable doubt. The following facts, among others would be offered to establish Defendant's guilt:**

On April 6, 2023, HSI Corpus Christi and the Corpus Christi Police Internet Crimes Against Children Task Force executed a state search warrant at a residence located in Corpus Christi, Texas. The subject agreed to a voluntary interview with agents during the execution of the search warrant. During this interview the subject claimed ownership of a Samsung cellular phone agents discovered in the subject's company vehicle. Later preliminary forensic examination of this phone revealed videos of child pornography that had been sent and received by the subject.

On April 19, 2023, agents with HSI took custody of the phone that was seized from the residence of the subject. HSI agents conducted a manual search of the phone and discovered multiple conversations from various messaging applications contained within the stored archives.

In one conversation agents discovered online communications between the subject and a then-unknown female subject who used the username Jessi on a messaging application. During the conversation, both individuals exchanged photos of themselves. The conversation between the subject and Jessi consisted of them speaking about their sexual desires of children. Jessi then sent a picture depicting a nude prepubescent child that was in her care. After the individual responded positively, he encouraged more similar pictures during which Jessi transmitted multiple sexually explicit pictures and videos of the male child, including nude depictions of the child with his genitals exposed. "Jessi" stated during the conversation that she was located in Virginia. This conversation took place on March 27, 2023, and further investigation revealed the subject communicating with "Jessi" was located in the Southern District of Texas that day.

Further investigation by HSI agents revealed that the person associated with the name "Jessi" on the messaging application was JESSICA VORSTER. Agents traced the account to a location in New York, with past locations from within Virginia. Record checks for JESSICA VORSTER revealed that VORSTER was present within the United States as a Visa holder entering the United States to work as an au pair. Photos from employment records for Jessica Vorster depict the same individual agents discovered in the photos depicting the child pornography. The

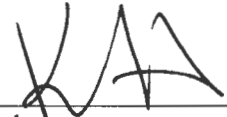
immigration records indicated that VORSTER began working in New York at a point after producing the child pornography.

VORSTER was subsequently arrested in New York and provided a post-*Miranda* statement to agents. VORSTER identified that her username in the messaging application was “Jessi”. VORSTER admitted to agents that she knew her conduct was illegal.

The parties hereto agree that the United States could prove the above facts beyond a reasonable doubt. The undersigned have thoroughly reviewed, understand, and agree that the information contained in this Stipulation of Fact are true and correct.

  
\_\_\_\_\_  
JESSICA VORSTER  
Defendant

8/30/24  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Attorney for Defendant

8/30/24  
\_\_\_\_\_  
Date

ALAMDAR S. HAMDANI  
UNITED STATES ATTORNEY

By:   
\_\_\_\_\_  
PATRICK OVERMAN  
Assistant United States Attorney

8/29/2024  
\_\_\_\_\_  
Date